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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,

Plaintiff,

vs.

JASON INGRASSIA, individually and in
his official capacity; COUNTY OF
CONTRA COSTA; and CITY OF
SAN RAMON.

Defendants.

Case No.: Case No. CV07-02669 (CRB)

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO FILE
OPPOSITION AND REPLY BRIEFS ON
PLAINTIFF'S MOTION IN LIMINE**

Date: April 25, 2007

Time: 10:00am

Honorable Charles R. Breyer

WHEREAS on February 15, 2008, the parties attended a case management conference before Judge Breyer, during which the court ordered the parties to submit briefing for a motion *in limine* to determine the admissibility of prior judicial findings underlying this case. The court ordered Plaintiff to file an opening brief by March 14, 2008 and for the hearing to be held on April 25, 2008. In regards to the deadlines for filing the opposition and reply briefs, the court requested that the parties agree upon a briefing schedule;

WHEREAS counsel for the parties briefly met after the case management to agree upon deadlines for filing the opposition and reply briefs;

1 WHEREAS counsel for the parties apparently had a misunderstanding as to what the
2 parties agreed upon as deadlines for filing the opposition and reply briefs;

3 WHEREAS counsel for the County of Contra Costa and the City of San Ramon filed its
4 opposition brief on April 3, 2008;

5 WHEREAS counsel for Defendant Ingrassia did not file its opposition brief until April
6 11, 2008;

7 WHEREAS Local Rule 7-3(a) requires that opposition briefs be filed 21 days prior to the
8 scheduled hearing date, or by April 4, 2008, and that reply briefs be filed 14 days prior to the
9 scheduled hearing date, or by April 11, 2008;

10 WHEREAS Plaintiff's counsel filed his reply brief on April 11, 2008, in accordance with
11 the local rules. In his reply brief, Plaintiff requested that the court strike the opposition brief of
12 Defendant Ingrassia as untimely;

13 WHEREAS on April 14, 2008, counsel for Defendant Ingrassia filed a letter to Plaintiff's
14 counsel requesting Plaintiff to withdraw his argument that Defendant Ingrassia's opposition brief
15 was untimely;

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IT IS HEREBY STIPULATED AND AGREED by the attorneys as follows:

1. Defendant Ingrassia's opposition brief is deemed timely as filed on April 11, 2008;
2. Plaintiff shall have until April 18, 2008 to fully respond to Defendant Ingrassia's opposition papers filed on April 11, 2008;
3. The hearing on Plaintiff's Motion *In Limine* shall remain as scheduled on April 25, 2008.

Dated: April 14, 2008
Oakland, California

JUSTICE FIRST, LLP
Attorneys for Plaintiff Abhinav Bhatnagar
By:

/s/
Jenny C. Huang
2831 Telegraph Avenue
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Tel.: (510) 628-0695

Dated: April 14, 2008
Walnut Creek, California

MCNAMARA, DODGE et al.
Attorney for Defendant Jason Ingrassia
By:

/s/
Noah G. Blechman
1211 Newell Avenue
Walnut Creek, CA 94596-5331
Tel.: (925) 939-5330

IT IS SO ORDERED.

Dated: April ___, 2008

UNITED STATES DISTRICT COURT JUDGE